

Jack Shaw (SDNY Bar No. JS0104)
E-mail: jack.shaw@procopio.com
PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP
1117 S. California, Suite 200
Palo Alto, California 94304
Telephone: (650) 645-9000
Facsimile: (650) 687-8300

Eric A. Plourde (SDNY Bar No. EP9546)
E-mail: eric.plourde@procopio.com
PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP
525 B Street, Suite 2200
San Diego, CA 92101
Telephone: 619.238.1900
Facsimile: 619.235.0398

Attorneys for Defendant Crazy Maple Studio, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual,

Plaintiff,

-against-

TRACY DEEBE-ELKENANEY P/K/A TRACY
WOLFF, an individual, EMILY SYLVAN KIM, an
individual, PROSPECT AGENCY, LLC, a New Jersey
limited liability company, ENTANGLED
PUBLISHING, LLC, a Delaware limited liability
company, HOLTZBRINCK PUBLISHERS, LLC,
D/B/A/ MACMILLAN, a New York limited liability
company, UNIVERSAL CITY STUDIOS, LLC, a
Delaware limited liability company, CRAZY MAPLE
STUDIO, INC, a California corporation,

Defendants.

Case No. 1:22-cv-02435-AT

STIPULATION AND ORDER

WHEREAS, Defendant Crazy Maple Studio, Inc. (“Crazy Maple”) was added to this action
as a Defendant in the First Amended Complaint (“FAC”);

WHEREAS, Crazy Maple accepted service of the First Amended Complaint by signing a Waiver of Service of Summons (“Waiver”);

WHEREAS, pursuant to the Waiver Crazy Maple originally had until and including August 1, 2022, to respond to the FAC;

WHEREAS, Crazy Maple has advised Plaintiff that it intends to file a motion to dismiss on grounds of personal jurisdiction and/or to transfer venue;

WHEREAS, Plaintiff and Crazy Maple are discussing the possibility of dismissing the Crazy Maple without prejudice as a party to the action;

WHEREAS, Plaintiff has agreed to extend Crazy Maple’s time to respond to the FAC to allow the parties time to hopefully finalize the agreement;

WHEREAS, the Court entered a prior order (ECF No. 52) continuing Defendant Crazy Maple Studio, Inc.’s (“Crazy Maple”) time to answer or move with regard to Plaintiff Lynne Freeman’s (“Plaintiff”) First Amended Complaint (ECF No. 24) until August 22, 2022;

WHEREAS, several unforeseen issues have come up during the negotiation of the dismissal between the parties, including, but not limited to, plaintiff’s counsel having been sick the last few days and Crazy Maple’s counsel is currently on trial, and the parties require additional time to finalize their agreement;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Crazy Maple that Crazy Maple’s time to answer or move with regard to Plaintiff’s First Amended Complaint (ECF No. 24) is hereby extended to September 7, 2022.

CSReeder, PC

By: /s/Mark Passin

Mark Passin (admitted *pro hac vice*)
11766 Wilshire Blvd., Suite 1470
Los Angeles, CA 90025
Tel.: (310) 861-2470
mark@csrlawyers.com

Paul LiCalsi

Reitler Kailas & Rosenblatt LLP

885 Third Avenue, 20th Floor
New York, New York 10022
Tel.: 212-209-3050
plicalisi@reiterlaw.com

Attorneys for Plaintiff Lynne Freeman

Procopio, Cory, Hargreaves & Savitch LLP

By: /s/Eric Plourde

Jack Shaw
1117 S. California, Suite 200
Palo Alto, California 94394
Tel.: (650) 645-9019
Jack.shaw@procopio.com

Eric Plourde

525 B Street, Suite 220
San Diego, CA 92101
Tel.: (619) 906-5641
Eric.plourde@procopio.com

*Attorneys for Defendant Crazy Maple Studio,
Inc.*

SO ORDERED.

Dated: _____, 2022

HON. ANALISA TORRES